

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: REGGIE CLAYTON,
DEBTOR

NO. 24-10404-JDW
CHAPTER 13

OBJECTION TO CONFIRMATION OF PLAN

Comes now, Creditor Mississippi Department of Human Services (MDHS), by and through its undersigned attorney, and hereby serves its notice of objection to confirmation of the Debtor's Chapter 13 Plan, and in support thereof would show unto the Court the following:

1. Debtor Reggie Clayton has one child support obligation. He is obligated to pay Julie Brown \$800.00 per month and has an arrearage of \$57,500.00.
2. A Proof of Claim was filed on April 23, 2024 and is incorporated herein for all its intended purposes.
3. On his plan, Debtor has not indicated how he intends to pay the ongoing obligation and arrears in Section 4.5 for Domestic Support Obligations.
4. MDHS rarely receives any payment and the arrearage increases every month.
5. Reggie Clayton should be required to pay his monthly support obligation and arrearage through the plan.

WHEREFORE, PREMISES CONSIDERED, creditor MDHS requests that this Court deny confirmation of the Plan, and order Debtor pay his monthly child support obligation and his arrearage through the plan.

Respectfully submitted, this, the 23rd day of April 2024.

/s/ Constance L Morrow
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CERTIFICATE OF SERVICE

I, Constance L Morrow, representative for Creditor, MDHS-DCSE, do hereby certify that I have this date either emailed a true and correct copy or electronically mailed through ECF, a copy of the attached foregoing Objection to Plan, to the following:

Robert Gambrell
Attorney for Debtor

United States Trustee
USTPRegion05.AB.ECF@usdoj.gov

Locke D. Barkley
Chapter 13 Trustee

This, the 23rd day of April, 2024.

/s/ Constance L Morrow